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By ECF

Honorable Lewis A. Kaplan
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Grant Berman, et al.*
S2 03 Cr. 308 (LAK)

Dear Judge Kaplan:

We write on behalf of our client, Grant Berman, who is currently on bail in connection with the above-captioned matter, to request permission for Mr. Berman to travel outside of the country for a second time for the balance of this week and the week of May 12 for business purposes. The Court previously granted our request to allow Mr. Berman's travel during the weeks of April 21, 2014 and April 28, 2014, when he traveled without incident and attempted to resolve all matters to obviate the need for additional visits. Mr. Berman has learned, however, that urgent quality control issues have arisen at his manufacturing facility that he desperately needs to address.

As we noted in our prior letter, Mr. Berman has been on bail in this matter since 2003. He resides in San Diego, California, and is an owner of a manufacturing business with a factory only a few miles over the border in Mexico. Because of the plant's close proximity to the border, Mr. Berman will return to the United States every day and will not spend a night in Mexico.

We have communicated with Assistant U.S. Attorney Alexander Wilson regarding this request, and he provided the Government's consent to the request. Accordingly, we respectfully request Your Honor's permission for Mr. Berman to travel outside of the country with prior notice to his Probation Officer from the date of this letter until May 18, 2014.

Respectfully submitted,

/s/ Daniel S. Ruzumna

Daniel S. Ruzumna

cc: AUSA Alexander Wilson